

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

DEC 21 2023

UNITED STATES OF AMERICA

*v.*

CHIRAG TOMAR

Case No.

1:23-MJ-1068-JKL

KEVIN P. WEIMER, Clerk  
By:  Deputy Clerk

**Government's Motion for Detention**

The United States of America, by counsel, Ryan K. Buchanan, United States Attorney, and Katherine I. Terry, Assistant United States Attorney for the Northern District of Georgia, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

**1. Eligibility of Case**

This case is eligible for a detention order because this case involves:

- A serious risk that the defendant will flee.

**2. Reason for Detention**

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required.

**3. Time for Detention Hearing**

The United States requests the Court conduct the detention hearing after continuance of 3 days.

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: December 21, 2023.

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Respectfully submitted,

RYAN K. BUCHANAN  
United States Attorney

*Katherine I. Terry*  
KATHERINE I. TERRY  
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**Certificate of Service**

The United States Attorney's Office served this document today by handing a copy to defense counsel.

December 21, 2023

*Katherine I. Terry*  
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KATHERINE I. TERRY  
*Assistant United States Attorney*